

June 28, 2006

Nebraska Public Service Commission
P.O. Box 94927
Lincoln, Nebraska 68509-4927

Attn: Angela Melton

Reference: Docket No. 911-017/PI-116 interim implementation policy

Dear Commissioners,

The below comments relate the Commission's interim policy regarding LB1222 and in particular the funding language wherein no Phase II requests will be funded until the full implementation of LB 1222 is completed.

I am the PSAP manager for Fremont/ Dodge County E-911, a position I have held since its inception in 1991. The Fremont/Dodge County E-911 Board has aggressively tried to pursue implementation of the wireless 911 technologies for the purposes of becoming Phase I and Phase II compliant. For the past several years we have been told that the Commission would be funding the necessary technologies for this implementation. With the partial funding assistance of the commission we were able to meet the Phase I requirements in January of 2005. Fremont/Dodge County is and has been ready for Phase two since that time.

I strongly disagree with the above-cited interim policy paragraph 3's not funding Phase II requests at this time. For the past four years I have been told to wait as funds become available. The cell phone users in Fremont and Dodge County have been paying the surcharge for wireless E-911 since that charge was initiated and as of this point have received very little in return on their taxes.

The Board and I both understand the need for larger populated areas subsidizing lesser-populated portions of the state but not at the expense of our own ability to implement both phases of Wireless E-911. The progress to this end is becoming mired down and is proving a frustration to the PSAPs. It is becoming personally difficult for me to keep justifying to the Board members and some of the public why we are still waiting for the funding from the Commission for the completion of wireless 911 implementation.

My second item of concern is provision that only one PSAP receive Commission funding assistance. I understand the need for this in many cases. In the case of Fremont/Dodge County E-911 the decision was purposely made to have both the Fremont Police and Dodge County Sheriff receive selectively routed calls from their particular areas of emergency service responsibilities. This also allowed for the ability to provide each location with back up or alternate answering point security. Incidentally, in the over 12 years of operation there have been six times when this system has proven necessary in providing seamless 911 coverage to all of Dodge County. The two answering points simply provide redundancy without the expense or waste of maintaining an un-manned or stand by system.

I suggest that a blanket policy such as above be looked at on a case-by-case and need basis. I understand the challenges in trying to adapt policies, rules and procedures that evenly and equitably apply to the Nebraska situation of population densities. In this case, Dodge County is penalized.

Your consideration of these concerns is greatly appreciated.

Sincerely,

Stephen F. Tellatin
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